

Florida PIRG

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Comments submitted by:

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Good afternoon. My name is Holly Binns, and I am the Clean Air & Energy Advocate for the Florida Public Interest Research Group (Florida PIRG). Florida PIRG is a statewide public interest advocacy organization that focuses on environmental, consumer and democracy issues. Thank you for the opportunity to share with you our concerns regarding environmental issues affecting the health of Florida's senior citizens. Today, I would like to address the grave problem of air pollution and its detrimental impacts on senior citizen's health.

A growing percentage of the public is entering their golden years. Today, more than 2.8 million Floridians are age 65 and over, a number that is expected to double by the year 2030, when more than 20 percent of the country's population will be in this age bracket.

We commend the EPA for moving forward with rules that will significantly reduce pollution from diesel truck and bus engines and fuel, and encourage the agency to expand these rules to include construction and farm equipment as well. However, we have grave concerns about White House and EPA actions that will weaken clean air rules for stationary sources and allow more harmful pollution to be emitted into our skies. Just as concerning is the Administration's justification of these changes by using cost-benefit calculations that assume a senior citizen's life is worth only 63% that of someone younger.¹

Reducing air pollution, and particularly power-plant pollution, can improve and extend senior citizens' lives. This is because senior citizens are especially vulnerable to health problems caused by air pollution. For the last two decades, heart disease, cancer, stroke and cardio-obstructive pulmonary disease have been the top four leading causes of death for persons age 65 years and older. Each of these is exacerbated by air pollution.² For example, fine particulate air pollution can pass from the lungs into the bloodstream, affecting heart rate, causing arrhythmia and inflammation, and potentially increasing the risk of death from heart failure. Mercury, an air pollutant for which electric utilities are the largest unregulated source, has been linked to heart attacks.³ Lung cancer also appears to be aggravated by air pollution exposure.⁴ In

¹ EPA, Technical Addendum: Methodologies for the Benefit Analysis of the Clear Skies Initiative available at http://www.epa.gov/air/clearskies/tech_adden.pdf

² Centers for Disease Control and Prevention, National Center for Health Statistics, Trends in Health and Aging, Trends in Causes of Death Among the Elderly, March-2001.

³ Committee on Toxicological Effects of Methylmercury, Toxicological Effects of Methylmercury, National Academy Press 2000. pp. 168-172 (available at www.nap.edu).

addition, rates of ischemic stroke deaths increase with increased concentrations of air pollutants including nitrogen dioxide and ozone.⁵ In Florida, summer ozone pollution causes an estimated 12,600 emergency room visits per year for COPD and other respiratory emergencies.⁶

Illnesses and deaths related to air pollution take a severe emotional and psychological toll on seniors and their loved ones. In addition, air pollution has a large economic toll. Currently, approximately eleven percent of senior citizens' total expenditures are on health care, compared to about five percent for other consumers.⁷ All told, heart disease, stroke and chronic lung diseases—conditions all made worse by air pollution—cost Americans nearly \$248 billion in direct medical costs in 2002, and resulted in another \$49 billion in lost productivity.⁸ Unfortunately, although summer smog “red alerts” warn the elderly to stay indoors, few policymakers are making the link between clean air, healthier seniors, and lower health-care costs for everyone.

Given the severe health consequences of air pollution for seniors, it is indefensible that the U.S. EPA is advancing policies that will result in increased air pollution, and thus undermine senior citizens' health. In December of last year, the EPA published a set of both finalized and proposed changes to the “New Source Review” program. Under these changes, 17,000 facilities, including refineries, chemical plants, pulp and paper mills, and power plants, will be able to increase air emissions without installing control technologies. Among others, your colleagues, the state and local air pollution control officials, criticize these changes, because they “will result in unchecked emission increases that will degrade air quality and endanger public health.”⁹ Fourteen states have filed suit in an effort to stop the U.S. EPA from moving forward with these changes to the New Source Review program.

Further, these changes have been denounced by former administrator Carol Browner, who has said, “[t]he current Administration's recent announcement of final and proposed changes to the New Source Review Program abandons the promise of the Clean Air Act - steady air quality improvements . . . There is no guarantee, and more importantly, no evidence or disclosure demonstrating that the Administration's announced final or proposed changes will make the air cleaner. In fact they will allow the air to become dirtier.”¹⁰

In addition to regulatory changes to the Clean Air Act, we are also extremely concerned about the Bush administration's so-called “Clear Skies” legislation that would allow power plants to emit more smog- and soot-forming pollution, as well as mercury, over a longer period of time than permitted under current law:¹¹

- The Bush administration's air pollution plan allows more than twice as much SO₂ for nearly a decade longer (2010-2018), compared to faithful enforcement of the current Clean Air Act. After 2018, SO₂ emissions will still be one and a half times higher than if current law is enforced;

⁴Pope, C.A., Burnett, R.T., Thun, M.J., Calle, E.E., Krewski, D., Ito, K., and Thurston, G.D. Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particle Pollution, *Journal of the American Medical Association*, Vol. 287, No. 9, March 6, 2002.

⁵ Hong, Y. C., Lee J.T., Him, H., Ha, E.H., Schwartz, J., and Christiani, D.C. Effects of Air Pollutants on Acute Stroke Mortality. *Environ. Health Perspec.* Vol 110, pp. 187-191, 2002.

⁶ Abt Associates. *Adverse Health Effects Associated with Ozone in the Eastern United States*. October 1999.

⁷ Administration on Aging, *A Profile of Older Americans: 2001*. Health, Health Care, and Disability. Found at www.aoa.gov/aoa/STATS/profile/2001/12.html.

⁸ *Morbidity & Mortality: 2002 Chart Book on Cardiovascular Lung, and Blood Diseases*, National Institutes of Health, National Heart, Lung, and Blood Institute, May 2002.

⁹ STAPPA/ALAPCO Press Release on EPA's New Source Review Reforms (November 22, 2002)

¹⁰ Testimony of Health, Education, Labor and Pensions Subcommittee on public Health Hearing on “Staying Healthy: Human Health and Changes to the Clean air Act” Tuesday, September 3, 2002.

¹¹ Comparison of caps in Administration's Clear Skies proposal available at www.epa.gov, with estimates of business as usual Clean Air Act implementation as described by EPA on September 18, 2001 in a meeting with the Edison Electric Institute.

- The Bush administration's air pollution plan allows more than one and a half times as much NOx for nearly a decade longer (2010-2018), and one third more NOx even after 2018;
- In addition, the President's plan allows power plants to emit five times as much mercury for a decade longer (2010-2018), and three times as much after 2018, compared to what could be emitted under current law, and unlimited levels of carbon dioxide, the leading causes of global warming.

We strongly urge the EPA to change course, and to instead focus its efforts on strengthening air pollution protections for senior citizens. We appreciate the opportunity to share our concerns with you today, and hope that we can work with you to ensure that any changes to our clean air laws include strong protections for Florida's senior citizens.